

EXHIBIT 2

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: ZOLOFT (SERTRALINE
HYDROCHLORIDE) PRODUCTS
LIABILITY LITIGATION**

§ **MDL NO. 2342**
§
§ **12-MD-2342**
§
§ **HON. CYNTHIA M. RUFÉ**
§
§
§

***THIS DOCUMENT RELATES TO:
ALL CASES***

**DEFENDANTS' REQUESTS FOR PRODUCTION OF DOCUMENTS TO
PLAINTIFFS' STEERING COMMITTEE**

Pursuant to the Federal Rules of Civil Procedure, Defendants Pfizer Inc. and Greenstone LLC hereby serve the attached Requests for Production and request that the Plaintiffs' Steering Committee answer and serve a copy of its responses upon Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, 22nd Floor, New York, New York 10010-1601, by July 28, 2015.

Dated: New York, New York
July 14, 2015

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CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2015, a true and correct copy of Defendants' Requests for Production of Documents to Plaintiffs' Steering Committee has been served via electronic mail upon Mark P. Robinson, Jr., Dianne Nast, and Stephen Corr of the Plaintiffs' Steering Committee.

Dated: New York, New York
July 14, 2015

/s/ Mark S. Cheffo
Mark S. Cheffo

DEFINITIONS AND INSTRUCTIONS

1. “Authors” means any person listed as an author or contributor to the Studies.
2. “Communication” includes any e-mails, letters, memoranda, presentations, proposals, negotiations, facsimiles, drafts, or recordings.
3. “Data” means any information regarding the Studies.
4. “You” or “Your” means each Plaintiff in the MDL, the Plaintiffs’ Steering Committee, or any agent, expert witness (whether consulting or testifying), or attorney working for or acting on behalf of any of the aforementioned.
5. “Studies” means any drafts, data, or pre-publication information about and the final published manuscript of the following papers:

Alwan S, Reefhuis J, Rasmussen SA, Olney RS, Friedman JM; National Birth Defects Prevention Study. Use of selective serotonin-reuptake inhibitors in pregnancy and the risk of birth defects. *N Engl J Med*. 2007 Jun 28;356(26):2684-92.

Ban L, Gibson JE, West J, Fiaschi L, Sokal R, Smeeth L, Doyle P, Hubbard R, Tata LJ. Maternal depression, antidepressant prescriptions, and congenital anomaly risk in offspring: a population based cohort study. *BJOG*. 2014 March 11; DOI:10.1111/1471-0528.12682.

Bérard A, Zhao JP, Sheehy O. Sertraline use during pregnancy and the risk of major malformations. *Am J Obstet Gynecol*. 2015 Jan 28. pii: S0002-9378(15)00090-3. doi: 10.1016/j.ajog.2015.01.034. [Epub ahead of print]

Colvin L, Slack-Smith L, Stanley FJ, Bower C. Dispensing patterns and pregnancy outcomes for women dispensed selective serotonin reuptake inhibitors in pregnancy. *Birth Defects Res A Clin Mol Teratol*. 2011 Mar;91(3):142-52. doi: 10.1002/bdra.20773. Epub 2011 Mar 4.

Furu K, Kieler H, Haglund B, Zoega H, Gissler M, Nørgaard M. Teratogenicity of Selective Serotonin-Reuptake Inhibitors and Venlafaxine – A Population-Based Study of 2.3 Million Births in Five Nordic Countries. *Pharmacoepidemiol Drug Saf*. 2014; 23(S1): 166-7.

Huybrechts KF, Palmsten K, Avorn J, Cohen LS, Holmes LB, Franklin JM, Mogun H, Levin R, Kowal M, Setoguchi S, Hernández-Díaz S. Antidepressant use in pregnancy and the risk of cardiac defects. *N Engl J Med*. 2014 Jun 19;370(25):2397-407.

Jimenez-Solem E, Andersen JT, Petersen M, Broedbaek K, Jensen JK, Afzal S, Gislason GH, Torp-Pedersen C, Poulsen HE. Exposure to selective serotonin reuptake inhibitors and the risk of congenital malformations: a nationwide cohort study. *BMJ Open*. 2012 Jun 18;2(3):e001148.

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Kornum JB, Nielsen RB, Pedersen L, Mortensen PB, Nørgaard M. Use of selective serotonin reuptake inhibitors during early pregnancy and risk of congenital malformations: updated analysis. *Clin Epidemiol*. 2010 Aug 9;2:29-36.

Louik C, Lin AE, Werler MM, Hernández-Díaz S, Mitchell AA. First-trimester use of selective serotonin-reuptake inhibitors and the risk of birth defects. *N Engl J Med*. 2007 Jun 28;356(26):2675-83.

Malm H, Artama M, Gissler M, Ritvanen A. Selective serotonin reuptake inhibitors and risk for major congenital anomalies. *Obstet Gynecol*. 2011 Jul;118(1):111-20.

Margulis AV, Abou-Ali A, Strazzeri MM, Ding Y, Kuyateh F, Frimpong EY, Levenson MS, Hammad TA. Use of selective serotonin reuptake inhibitors in pregnancy and cardiac malformations: a propensity-score matched cohort in CPRD. *Pharmacoepidemiol Drug Saf*. 2013 Sep; 22(9):942-51. Epub 2013 Jun 3.

McDonagh M, Matthews A, Phillipi C, Romm J, Peterson K, Thakurta S, Guise JM, and Pacific Northwest Evidence-based Practice Center. Evidence Report/Technology Assessment Number 216: Antidepressant Treatment of Depression During Pregnancy and the Postpartum Period. AHRQ Publication No. 14-E003-EF. 2014 July.

Myles N, Newall H, Ward H, Large M. Systematic meta-analysis of individual selective serotonin reuptake inhibitor medications and congenital malformations. *Aust N Z J Psychiatry*. 2013 Nov; 47(11):1002-12. Epub 2013 Jun 12.

Pedersen LH, Henriksen TB, Vestergaard M, Olsen J, Bech BH. Selective serotonin reuptake inhibitors in pregnancy and congenital malformations: population based cohort study. *BMJ*. 2009 Sep 23;339:b3569.

Reefhuis J, Devine O, Friedman JM, Louik C, Honein MA. Specific SSRIs and birth defects: bayesian analysis to interpret new data in the context of previous reports. *BMJ*. 2015;351:h3190.

Reis M, Källén B. Delivery outcome after maternal use of antidepressant drugs in pregnancy: an update using Swedish data. *Psychol Med*. 2010 Oct;40(10):1723-33. Epub 2010 Jan 5

Wang S, Yang L, Wang L, Gao L, Xu B, Xiong Y. Selective serotonin reuptake inhibitors and the risk of congenital heart defects: a meta-analysis of prospective cohort studies. *Am Heart Assoc*. 2015; 4: e001681 May 19, 2015.

6. If any privilege is claimed with respect to any information covered by these requests, the following information should be provided: (a) the number of the request to which the information is responsive; (b) without disclosure of information claimed to be privileged,

identification of the information by nature, subject matter, date, author, and recipient(s);
(c) a statement of the basis on which privilege is claimed or a statement of the reason why the information is not or cannot be provided.

REQUESTS FOR PRODUCTION

Request for Production No. 1

Produce all Communications You have had with the Authors of the Studies about the Studies.

Request for Production No. 2

Provide all Data from the Studies.